

KELLER BENVENUTTI KIM LLP  
Jane Kim (#298192)  
(jkim@kbkllp.com)  
David A. Taylor (#247433)  
(dtaylor@kbkllp.com)  
Dara L. Silveira (#274923)  
(dsilveira@kbkllp.com)  
650 California Street, Suite 1900  
San Francisco, CA 94108  
Tel: 415 496 6723  
Fax: 650 636 9251

## *Attorneys for Debtors and Reorganized Debtors*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

In re:

**Bankruptcy Case No. 19-30088 (DM)**

## **PG&E CORPORATION,**

Chapter 11

- and -

**(Lead Case) (Jointly Administered)**

## **PACIFIC GAS AND ELECTRIC COMPANY,**

## **Debtors.**

- Affects PG&E Corporation
- Affects Pacific Gas and Electric Company
- Affects both Debtors

## **Response Deadline:**

**December 6, 2022, 4:00 p.m. (PT)**

*\* All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

#### **Hearing Information If Timely Response Made:**

Date: December 20, 2022

Date: December 23, 2022  
Time: 10:00 a.m. (Pacific Time)

Time: 10:00 a.m. (Pacific Time)  
Place: (Tele/Videoconference Appearances Only)

(Tele) Videocommerce Appearance  
United States Bankruptcy Court

United States Bankruptcy Court  
Courtroom 17, 16th Floor

Courtroom 17, 10th Floor  
San Francisco, CA 94102

1           **PLEASE TAKE NOTICE** that on January 29, 2019 (the “**Petition Date**”), PG&E Corporation  
2 and Pacific Gas and Electric Company, as debtors and reorganized debtors (the “**Debtors**,” or as  
3 reorganized pursuant to the Plan, the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases  
4 (the “**Chapter 11 Cases**”), each filed a voluntary petition for relief under chapter 11 of title 11 of the  
United States Code (the “**Bankruptcy Code**”) with the United States Bankruptcy Court for the  
Northern District of California (San Francisco Division) (the “**Bankruptcy Court**”).

5           **PLEASE TAKE FURTHER NOTICE** that the Bankruptcy Court will hold a hearing on  
6 **December 20, 2022, at 10:00 a.m. (Pacific Time)** (the “**Omnibus Hearing**”) before the Honorable  
Dennis Montali, United States Bankruptcy Judge. Pursuant to the Bankruptcy Court’s *Eighth  
Amended General Order No. 38 In re: Coronavirus Disease Public Health Emergency*, effective  
7 December 1, 2021 and until otherwise ordered, **all hearings shall be conducted by video or  
teleconference. The Courtroom will be closed.** All interested parties should consult the Bankruptcy  
8 Court’s website at [www.canb.uscourts.gov](http://www.canb.uscourts.gov) for information about court operations during the COVID-  
9 19 pandemic. The Bankruptcy Court’s website provides information regarding how to arrange a  
10 telephonic or video appearance. If you have any questions regarding how to appear at a court hearing,  
you may contact the Bankruptcy Court by calling 888-821-7606 or by using the Live Chat feature on  
the Bankruptcy Court’s website.

11           **PLEASE TAKE FURTHER NOTICE** that, in addition to any other matters to be heard at the  
12 Omnibus Hearing, the Bankruptcy Court is scheduled to hear the *Reorganized Debtors’ One Hundred  
Nineteenth Omnibus Objection to Claims (No Liability Claims)*, filed on November 10, 2022  
13 [Dkt. No. 13238] (the “**Omnibus Objection**”).

14           **PLEASE TAKE FURTHER NOTICE** that any oppositions or responses to the Omnibus  
Objection must be in writing, filed with the Bankruptcy Court, and served on counsel for the  
15 Reorganized Debtors at the above-referenced address or by email at [PGEclaims@kbkllp.com](mailto:PGEclaims@kbkllp.com) so as to  
be received by no later than **4:00 p.m. (Pacific Time) on December 6, 2022**. Any oppositions or  
16 responses must be filed and served as described in the *Order Approving (A) Procedures for Filing  
Omnibus Objections to Claims and (B) the Form and Manner of the Notice of Omnibus Objections*,  
17 entered on July 1, 2020 [Dkt No. 8228] (the “**Omnibus Objections Procedures Order**”). **Any relief  
requested in the Omnibus Objection may be granted without a hearing if no opposition is timely  
filed and served in accordance with the Omnibus Objections Procedures Order.** In deciding the  
18 Omnibus Objection, the Court may consider any other document filed in these Chapter 11 Cases and  
related Adversary Proceedings.

19           **PLEASE TAKE FURTHER NOTICE** that a customized One Hundred Nineteenth Omnibus  
Claim Objection Notice in substantially the form attached hereto as **Exhibit A** has been sent to each of  
20 the parties to whose Proof(s) of Claim the Reorganized Debtors objected in the Omnibus Objection.

21           **PLEASE TAKE FURTHER NOTICE** that copies of the Omnibus Objection and its  
supporting documents can be viewed and/or obtained: (i) by accessing the Court’s website at  
22 <http://www.canb.uscourts.gov>, (ii) by contacting the Office of the Clerk of the Court at 450 Golden  
Gate Avenue, San Francisco, CA 94102, or (iii) from the Debtors’ notice and claims agent, Kroll  
Restructuring Administration LLC (formerly known as Prime Clerk), at  
23 <https://restructuring.ra.kroll.com/pge> or by calling (844) 339-4217 (toll free) for U.S.-based parties; or  
24 +1 (929) 333-8977 for International parties or by e-mail at: [pgeinfo@ra.kroll.com](mailto:pgeinfo@ra.kroll.com). Note that a PACER  
password is needed to access documents on the Bankruptcy Court’s website.

1 Dated: November 10, 2022

2 **KELLER BENVENUTTI KIM LLP**

3 /s/ *Dara L. Silveira*  
4 Dara L. Silveira

5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Attorneys for Debtors and Reorganized Debtors

1                   **Exhibit A**

2                   **One Hundred Nineteenth Omnibus Claim Objection Notice**

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

1 KELLER BENVENUTTI KIM LLP  
2 Jane Kim (#298192)  
(jkim@kbkllp.com)  
3 David A. Taylor (#247433)  
(dtaylor@kbkllp.com)  
4 Dara L. Silveira (#274923)  
(dsilveira@kbkllp.com)  
5 650 California Street, Suite 1900  
6 San Francisco, CA 94108  
Tel: 415 496 6723  
Fax: 650 636 9251

7 *Attorneys for Debtors and Reorganized Debtors*

THE OBJECTION DESCRIBED IN THIS NOTICE ASKS THE COURT TO DISALLOW AND/OR EXPUNGE YOUR CLAIM(S) IDENTIFIED AS "OBJECTED-TO" ON THE FOLLOWING PAGE OF THIS NOTICE.

CLAIMANTS RECEIVING THIS NOTICE SHOULD READ THIS NOTICE CAREFULLY BECAUSE THE OBJECTION MAY AFFECT YOUR RIGHT TO RECEIVE A DISTRIBUTION ON YOUR CLAIM IN THIS CASE.

IF YOU HAVE QUESTIONS, PLEASE CONTACT KROLL RESTRUCTURING ADMINISTRATION LLC, AT (844) 339-4217

THE LAST PARAGRAPH OF THIS NOTICE EXPLAINS HOW YOU CAN OBTAIN A COMPLETE COPY OF THE OBJECTION, AT NO COST TO YOU.

13  
14 **UNITED STATES BANKRUPTCY COURT**  
15 **NORTHERN DISTRICT OF CALIFORNIA**  
16 **SAN FRANCISCO DIVISION**

17 **In re:**

18 **PG&E CORPORATION,**

19 **- and -**

20 **PACIFIC GAS AND ELECTRIC**  
**COMPANY,**

21 **Debtors.**

22  Affects PG&E Corporation  
23  Affects Pacific Gas and Electric Company  
 Affects both Debtors

24 \* *All papers shall be filed in the Lead Case, No.*  
19-30088 (DM).

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**NOTICE OF THE REORGANIZED DEBTORS' ONE HUNDRED NINETEENTH OMNIBUS OBJECTION TO CLAIMS (NO LIABILITY CLAIMS)**

**Response Deadline:**  
**December 6, 2022, 4:00 p.m. (PT)**

**Hearing Information If Timely Response Made:**

Date: December 20, 2022

Time: 10:00 a.m. (Pacific Time)

Place: (Tele/Videoconference Appearances Only)  
United States Bankruptcy Court  
Courtroom 17, 16th Floor  
San Francisco, CA 94102

1 [Claimant Name]

2

Objected-To Claim(s)					Basis for Objection
Date	Claim #	Debtor	Classification	Amount	

3

4

5

6 On November 10, 2022, PG&E Corporation and Pacific Gas and Electric Company, as debtors  
7 and reorganized debtors (collectively, the “**Debtors**,” or as reorganized pursuant to the Plan, the  
“**Reorganized Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”), filed  
8 their *Reorganized Debtors’ One Hundred Nineteenth Omnibus Objection to Claims (No Liability  
Claims)* (the “**Omnibus Objection**”) with the United States Bankruptcy Court for the Northern  
9 District of California (San Francisco Division) (the “**Bankruptcy Court**”). A full copy of the  
Omnibus Objection may be obtained at no cost, as provided below.

10 **Any Response (as defined below) to the Omnibus Objection must be filed and  
served upon the Reorganized Debtors’ Counsel by December 6, 2022 (the  
“Response Deadline”);**

11

12 **Any Response must be accompanied by any declarations or memoranda of law any  
responding party wishes to present in support of its position;**

13

14 **If there is no timely Response, the Bankruptcy Court may enter an order granting  
the Omnibus Objection to your Proof(s) of Claim by default.**

15

16 **If you file a timely Response, the Hearing will be held at the date and time shown  
below. If factual disputes are presented by the Objection and the Response, the  
Hearing will proceed as a status conference; factual disputes will not be decided at  
the Hearing, but at a future evidentiary hearing that may be set at the Hearing.  
Issues of a purely legal nature, where facts are not in dispute, may be decided at  
the Hearing. See Bankruptcy Local Rule 3007-1.**

17

18

19 **If you file and serve a timely Response, the date, location and time of the Hearing  
are:**

20

21 **December 20, 2022, at 10:00 a.m. (Pacific Time)**

22

23 **Courtroom 17, 16<sup>th</sup> Floor, 450 Golden Gate Ave., San Francisco, CA**

24

25

26

27

28

The Hearing will be held before the Honorable Dennis Montali, United States Bankruptcy  
Judge. Pursuant to the Bankruptcy Court’s *Eighth Amended General Order No. 38 In re: Coronavirus  
Disease Public Health Emergency*, effective December 1, 2021 and until otherwise ordered, **all  
hearings shall be conducted by video or teleconference. The Courtroom will be closed.** All  
interested parties should consult the Bankruptcy Court’s website at [www.canb.uscourts.gov](http://www.canb.uscourts.gov) for  
information about court operations during the COVID-19 pandemic. The Bankruptcy Court’s website  
provides information regarding how to arrange a telephonic or video appearance. If you have any  
questions regarding how to appear at a court hearing, you may contact the Bankruptcy Court by calling  
888-821-7606 or by using the Live Chat feature on the Bankruptcy Court’s website.

1           **These Omnibus Claims Objection Procedures DO NOT APPLY to any proofs of claim  
with respect to (a) FIRE VICTIM CLAIMS or (b) SUBROGATION WILDFIRE CLAIMS.**

2           **BASIS FOR OBJECTION TO YOUR PROOF(S) OF CLAIM:** By the Omnibus  
3           Objection, the Reorganized Debtors seek to disallow and/or expunge one or more of your Proof(s) of  
4           Claim (as defined therein) listed above as “Objected-To Claim(s)” on the grounds that the designated  
Proof(s) of Claim seek recovery of amounts for which the Debtors are not liable.

5           If you do **NOT** oppose the disallowance and/or expungement of your Objected-To Proof(s) of  
6           Claim listed above, then you do **NOT** need to file a written Response to this Omnibus Objection and  
you do **NOT** need to appear at the Hearing. If you do nothing, the Objected-To Claim(s) will be  
disallowed and/or expunged.

7           **FILING AND SERVICE OF RESPONSE:** If you **DO** oppose the disallowance and/or  
8           expungement of your Objected-To Proof(s) of Claim listed above, then you **MUST** file a response (a  
9           “**Response**”), in writing, with the Bankruptcy Court, and serve it on the counsel for the Reorganized  
10          Debtors at PGEclaims@kbkllp.com so as to be received by no later than **4:00 p.m. (Pacific Time) on  
December 6, 2022 (the “Response Deadline”)**: You must file the Response through the Court’s  
11          electronic case filing (“ECF”) system if you have access to the ECF system; service on the  
Reorganized Debtors’ Counsel will occur automatically upon ECF filing; and no separate service of  
12          your Response is required. If you do **NOT** have access to the ECF system, service must be made by  
13          electronic mail to the Reorganized Debtors’ counsel at PGEclaims@kbkllp.com, and you must arrange  
for the Response to be filed with the Court within two business days thereafter. If you do not have the  
14          ability to serve a Response electronically, the Response must be served by mail, express or some other  
means so either (a) it is actually received by the Reorganized Debtors’ Counsel by the Response  
15          Deadline, or (b) it is dispatched not later than the Response Deadline through a postal or commercial  
express service that will make actual delivery not more than two business days after the Response  
16          Deadline, and in that case the Claimant must inform the Reorganized Debtors’ counsel by email,  
telephone or facsimile before the Response Deadline of the Claimant’s name and phone number, the  
number of the Omnibus Objection, and the fact that a paper Response is being delivered by express.

17           **CONTENTS OF RESPONSE** The Response must, at a minimum, include the following:  
18          (i) a caption setting forth the name of the Bankruptcy Court, the name of the Reorganized Debtor, the  
case number and title of the Omnibus Objection to which the Response is directed; (ii) your name, the  
assigned number(s) of your Proof(s) of Claim, and an explanation for the amount of the Proof(s) of  
Claim; (iii) a concise statement setting forth the reasons why the Bankruptcy Court should not sustain  
the Omnibus Objection; (iv) a declaration under penalty of perjury of a person with personal  
knowledge of the relevant facts that support the Response; (v) your name, address, telephone number,  
and/or the name, address, and telephone number of your attorney and/or designated representative to  
whom counsel for the Reorganized Debtors should serve a reply to the Response, if any; and (vi) the  
name, address, telephone number, and email address of the party with authority to reconcile, settle, or  
otherwise resolve the Omnibus Objection on your behalf, if any.

24           If the Bankruptcy Court does not disallow and/or expunge your Objected-To Proof(s) of Claim  
listed above, then the Reorganized Debtors have the right to object on other grounds to your Proof(s)  
25          of Claim at a later date. You will receive a separate notice of any such objection.

26           **TO GET COPIES OF THE COMPLETE OBJECTION:** Copies of the complete Omnibus  
Objection and the other pleadings and documents identified herein can be viewed and/or obtained:  
27          (i) by accessing the Bankruptcy Court’s website at <http://www.canb.uscourts.gov> [PACER account  
required], (ii) for free by downloading on the Reorganized Debtors’ approved notice and claim agent’s  
28

1 website at <https://restructuring.ra.kroll.com/pge>, or (iii) by mail, for free, by calling by calling (844)  
2 339-4217 (toll free) for U.S.-based parties; or +1 (929) 333-8977 for International parties or by e-mail  
3 at: pgeinfo@ra.kroll.com.

4 Dated: November 10, 2022

5 **KELLER BENVENUTTI KIM LLP**

6 */s/ Dara L. Silveira*  
7 Dara L. Silveira

8 *Attorneys for Debtors and Reorganized Debtors*

9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28